OCT 15 1990

Mr. Ed Kaup
Case Manager
Bureau of Federal Case Management
New Jersey Department of
Environmental Protection, CN 028
Trenton, NJ 08625-0028

Re: L. E. Carpenter Superfund Site
Draft FS Development of Alternatives

Dear Mr. Kaup:

I have briefly reviewed the above-referenced document, which was prepared by Roy F. Weston, Inc. and is dated September 28, 1990. Please consider the enclosed comments when the New Jersey Department of Environmental Protection's comments on the document are being prepared.

I have also enclosed a copy of a memo from EPA's Water Management Division commenting on the Revised Report of Remedial Investigation (RI) Findings. As you know, there was a delay in obtaining extra copies of this report for distribution to various EPA reviewers. As a result, it may not be timely to address these comments in the Revised Report of Remedial Investigation Findings. However, it may be possible to address them in the supplemental RI work or in the feasibility study.

Please contact me at (212) 264-8098 if you wish to discuss this matter.

Sincerely yours,

Jonathan Josephs
Chemical Engineer
New Jersey Compliance Branch

Enclosure

bcc: Debra S. Curry, WMD

JJ 10/15/90

Comments on the Draft FS Development of Alternatives for the L. E. Carpenter Site

Page	Comment
2-2	Although existing drinking water sources do not appear to have been adversely affected by the site, the contamination from the site has affected a potential drinking water source (i.e., the currently contaminated groundwater underlying the site, which is a potential source of drinking water). EPA guidance makes it clear that Federal and State drinking water regulations are "relevant and appropriate requirements" for this scenario. (See Page 5-3 in Part I of the CERCLA Compliance with Other Laws Manual, dated August 8, 1988, for further explanation.) The report should make it clear that promulgated Federal and State drinking water regulations are ARARs for groundwater, to the extent that they are not superseded by any other cleanup standards which are more stringent.
2-9	While Ambient Water Quality Criteria (AWQCs) may be ARARs, they are not "applicable" requirements. AWQCs were developed by EPA as advisories to be used by states in establishing state water quality standards. AWQCs are likely to be relevant and appropriate if a state does not have an adequately protective water quality standard for a particular contaminant. If the listing in Section 2.2.4 is intended to include all sources of chemical specific ARARs, Federal and State drinking water regulations should be included in the listing. If the intent is only to include "applicable" requirements, then the AWQCs should be deleted. Part I of the CERCLA Compliance with Other Laws Manual provides further discussion of the distinction between "applicable" and "relevant and appropriate" requirements.
4-7	It appears that the narrative in Section 4.2.3 belongs in Section 4.3.3. Since Sections 4.2.3.1 and 4.2.3.2 deal with containment measures applied at the site surface, a new narrative in Section 4.2.3 should be added to deal with this subject matter.
4-11	The mechanism of soil washing can involve more than the solubilization of contaminants, which is the only mechanism discussed in this section. For some soil/contaminant/washing fluid combinations, the chief mechanism of soil cleaning will involve the washing of fine soil particles from coarser soil particles. In the case of the L. E. Carpenter site, the soil is predominantly coarse sand and gravel with a small amount of silt. However, a large portion of the contamination may be associated with the silt

particles, to which contaminants are likely to adhere. Washing the fine silt particles from the sand and gravel may leave a relatively clean sand and gravel. The used washing fluid (probably containing both suspended and dissolved contaminants) would be likely to require further treatment.

4-33 There appears to be an error on the eighth line from the bottom of the page. Shouldn't it say that the floating product intake floats on water, rather than on oil?

4-34 The discussion on this page mentions that recovery wells which lower the water table will, in addition to collecting contaminated groundwater, also can accelerate the collection of floating product. However, there is also a potential disadvantage of lowering the water table. As a result of the lowering of the water table under the floating product, deeper soils which have not previously contacted floating product will be exposed to it. Once these soils become saturated with floating product, they may be a source of contaminated leachate for an extended period of time. While a recovery well system can be designed to prevent excessive horizontal and vertical movement of floating product, this potential disadvantage of recovery wells should be noted.